

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

TÜRKİYE HALK BANKASI A.Ş.,

Defendant.

S6 15 Cr. 867 (RMB)

DEFENDANT TÜRKİYE HALK BANKASI A.Ş.'S MOTION TO STAY

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law and materials cited therein, the undersigned will move this Court before the Honorable Richard M. Berman, in Room 17B of the United States District Court, 500 Pearl Street, New York, New York, 10007, for an order staying all further proceedings in this case, including all deadlines, pending resolution of Halkbank's petition for mandamus from the Second Circuit regarding the Court's denial of Halkbank's motion to recuse the assigned judge.

Halkbank has conferred with counsel for the government, who has indicated that the government opposes the requested relief.

Dated: August 25, 2020

Respectfully submitted,

WILLIAMS & CONNOLLY LLP

/s Robert M. Cary

Robert M. Cary
Simon A. Latcovich
James W. Kirkpatrick
Damayanti Desai
725 Twelfth Street, N.W.
Washington, D.C. 20005

650 Fifth Ave., Suite 1500
New York, New York 10019
Phone: (202) 434-5000
Fax: (202) 434-5029
Email: rcary@wc.com
slatcovich@wc.com
jkirkpatrick@wc.com
ddesai@wc.com